

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE: JAMES & GWENDOLYN BAILEY
DEBTORS

BANKRUPTCY NO.: 14-13318-JDW
CHAPTER 13

OBJECTION TO CONFIRMATION OF FIRST AMENDED CHAPTER 13 PLAN

COMES NOW the Internal Revenue Service (“IRS”), by and through the United States Attorney’s Office for the Northern District of Mississippi, and files this its Objection to Confirmation of Debtors’ First Amended Chapter 13 Plan and in support of said Objection the IRS would state to wit:

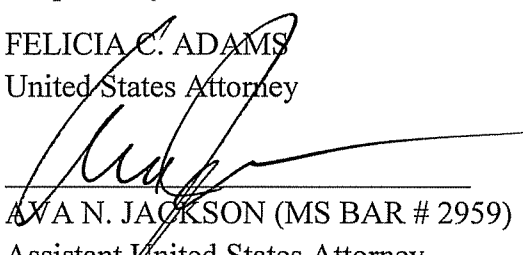
1. The IRS has filed its Amended Proof of Claim in the amount of \$114,475.19, representing a secured claim of \$86,960.17, and priority claim of \$970.38, and a general unsecured claim of \$26,544.64.
2. Debtors’ scheduled and filed federal tax forms support the IRS’s Proof of Claim as amended.
3. This Court entered an Order approving the IRS’s Claim on April 13, 2015 (Dk# 48). Attached to said Order is a series of emails to Debtors’ attorney regarding said Order to which he had agreed but failed to sign. [See page 3 of Dk# 48, March 23, 2015, the initial email from Mr. Gambrell.] The emails also asked Debtors’ attorney on several occasions to advise of necessary changes or make corrections to the Order, to no avail.
4. Debtors cannot now try and circumvent the Court’s ruling.

WHEREFORE the IRS prays that Debtors' First Amended Chapter 13 Plan be denied and Debtors' Chapter 13 Plan only be amended according to the Order entered by this Court on April 13, 2015 regarding the IRS's Claim. The IRS prays for such other relief it may be entitled.

Respectfully submitted,

FELICIA C. ADAMS
United States Attorney

By:



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CERTIFICATE OF SERVICE

I, AVA N. JACKSON, Assistant United States Attorney for the Northern District of Mississippi, hereby certify that I electronically filed the foregoing **Objection to Confirmation of First Amended Chapter 13 Plan** with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Robert Gambrell, *Counsel for Debtors*
rg@ms-bankruptcy.com

U.S. Trustee
USTPRegion05.AB.ECF@usdoj.gov

Locke D. Barkley
sbeasley@barkley13.com

and I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants:

James and Gwendolyn Bailey
2641 Garden Gate Drive
Hernando, MS 38632

This the 30^h day of April, 2015.



AVA N. JACKSON
Assistant United States Attorney